

RECORD OF COMMUNICATION	<input checked="" type="checkbox"/> Phone Call <input type="checkbox"/> Discussion <input type="checkbox"/> Field Trip <input type="checkbox"/> Conference <input type="checkbox"/> Other (specify) _____	
	(Record of item checked above)	
TO: File	FROM: Don Lininga	DATE: 9/18/92
SUBJECT: General Electric - Switchgear Operations - ^{West Burlington, IA} IDDCUS 272763		
SUMMARY OF COMMUNICATION: #319 753-8508 I called Ms. Beth McBee to discuss the letter she sent to me on 8/17/92 regarding the KFA we conducted at her facility. (Letter Attached) I inform her that based on the comments, we would not revise any portions of the report. I will attach a copy of the letter to the KFA, and one will also be a Status Above Document in the file.		
CONCLUSIONS, ACTIONS TAKEN OR REQUIRED:		
INFORMATION COPIES TO: File, Also inserted into final RFA report #77 2/7/92		



R00324018
RCRA RECORDS CENTER

GENERAL ELECTRIC COMPANY
SWITCHGEAR OPERATIONS

AUGUST 17, 1992

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101
ATTEN: DON LININGER/RCRA IOWA

ELECTRICAL DISTRIBUTION AND CONTROL
510 AGENCY ROAD
P.O. BOX 488
W. BURLINGTON, IA 52655
319-753-8508

RECEIVED
AUG 18 1992

IOWA SECTION

DEAR SIR:

IN RESPONSE TO THE RCRA FACILITIES ASSESSMENT REPORT COMPLETED IN FEBRUARY OF 1992. PLEASE REVIEW THE FOLLOWING ITEMS AND WE WOULD REQUEST THESE CHANGES BE MADE FOR OUR FACILITY.

ITEM 1: IN THE INTRODUCTION THE EPA CONSULTANT HAS INCORRECTLY DESCRIBED THE RCRA CORRECTIVE ACTION PROGRAM. WE FEEL THAT STEP THREE SHOULD READ AS A CORRECTIVE MEASURES STUDY RATHER THAN "CORRECTIVE MEASURES." IN THE EVENT OF REQUIRED CORRECTIVE ACTIONS. WE WOULD LIKE THE OPPORTUNITY TO HAVE A STUDY DONE WHICH WOULD INCLUDE COST CONSIDERATIONS FOR VARIOUS ALTERNATIVES BEFORE CORRECTIVE MEASURES BE IMPOSED.

ITEM 2: SINCE OUR WITHDRAWAL FOR THE PART B PERMIT. WE FEEL THAT ANY CORRECTIVE ACTION THAT MAY ARISE FROM THIS ASSESSMENT BE DONE THROUGH A "CONSENT ORDER" BEFORE "PERMIT CONDITIONS" ARE ISSUED BY THE EPA.

ITEM 3: WE DO NOT FEEL THAT SWMU #6 IS CORRECTLY IDENTIFIED. THE DEGREASER STILL IS A GENERATION UNIT AND NOT A STAND ALONE SWMU. THE STILL IS AN INTEGRAL PART OF THE TOTAL UNIT. WE DO HAVE AN AIR PERMIT THAT REGULATES THE UNIT AND WOULD LIKE CONSIDERATION TO CHANGE THIS DESIGNATION FROM A SWMU TO AN "AREA OF CONCERN."

ITEM 4: AS IN ITEM 3 (DEGREASER STILL) WE WOULD LIKE FOR SWMU 7 (WET SCRUBBERS) TO ALSO BE RECLASSIFIED FROM A SWMU TO AN AOC BECAUSE THIS IS LIKEWISE COVERED BY AN AIR PERMIT AND WAS ALSO STATED IN THE RFA TO BE OF A LOW POTENTIAL FOR RELEASE.

ITEM 5: SWMU 4 (WASTE WATER TREATMENT PLANT UNDERGROUND PROCESS TANKS) SOIL SAMPLES TAKEN BY THE EPA HAVE SHOWN SUBSTANTIALLY LOWER LEVELS OF HAZARDOUS METALS THAN WAS REPORTED BY GE DURING THE ACTUAL TANK REMOVAL. BOTH SAMPLES SHOW LEVELS BELOW ANY EPA DEFINED ACTION LEVELS. WE FEEL THIS SHOWS WE DO NOT HAVE A SOIL CONTAMINATION PROBLEM AND DO NOT FEEL THAT THERE SHOULD BE ANY FURTHER INVESTIGATION AND/OR CLEAN-UP COSTS ASSOCIATED WITH THIS SWMU. AS THERE WAS MENTIONED AN ISSUE OF "FUGITIVE (DUST) EMISSIONS FROM THIS UNIT AREA GE HAS SUBSEQUENTLY PLANTED GRASS OVER THE ENTIRE AREA. THE FINAL POINT IN THIS ITEM IS THAT TANK #6 WAS INCORRECTLY IDENTIFIED AS BEING A PART OF THIS SWMU. EPA DOCUMENTATION ON PAGE 29 DOES NOT IDENTIFY TANK #6 AS HOLDING HAZARDOUS WASTE.

ITEM 6: CONCERNING AOC-A (THE E-COAT DIP TANK). THE UNIT DOES USE PAINTS THAT GENERATE LEAD CONTAINING WASTE. THE RFA DOES NOT ASSESS A RELEASE POTENTIAL FROM THIS UNIT AND DUE TO THE TECHNOLOGY OF THIS UNIT WE DO NOT FEEL IT SHOULD BE CLASSIFIED AS AN AREA OF CONCERN. THIS UNIT IS ALSO COVERED BY AN AIR PERMIT WHICH ALLOWS FOR A RELEASE OF 8 TONS OF ETHYLENE GLYCOL MONOBUTYL ETHER.

PAGE THREE

ITEM 13: THE RFA REPORT (PAGE 8, PARAGRAPH ~~5~~ AND TABLE 1) DESCRIBES THE SPENT SOLVENT FROM THE PARTS WASHERS AS IGNITABLE (D001), TO CONTAIN LEAD (D008) AND AS BEING TETRACHLOROETHYLENE (D039). BY OUTSIDE CONTRACTOR THE TCLP FOR THE PARTS WASHER MATERIAL CONTAINS NO D039.

ITEM 16: ON PAGE 5, LAST PARAGRAPH, TABLE 1 IT HAS BEEN IDENTIFIED THAT SPENT THINNERS ARE F003 AND F005. AS THIS MATERIAL IS MIXED IN WITH THE EXISTING F003, FINAL PAINT LIQUID WASTE, THERE IS NO SEPARATE AND DISTINCT WASTE STREAM GENERATED FOR THIS PRODUCT. THEREFORE, THE F003 CODE IS USED FOR THE COMBINED WASTE PRODUCT.

WE FEEL THESE ISSUES SHOULD BE REVIEWED AND ADDED TO OUR EXISTING FILE AS PERMANENT ADDENDUM OR THE RFA OPENED TO REFLECT THESE CHANGES IN THE BODY OF THE TEXT. WE APPRECIATE YOUR TIME IN REVIEWING THESE LISTED ITEMS AND LOOK FORWARD TO YOUR RESPONSE. YOU MAY REACH ME AT 319-753-8508, FROM 8:00 AM TO 4:30 PM MONDAY THROUGH FRIDAY.

SINCERELY,

Beth McBee
BETH MCBEE

MANAGER, SAFETY AND ENVIRONMENTAL PROGRAMS